

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Paul Tremblay, et al.

Plaintiffs,

v.

**OpenAI, Inc., OpenAI, L.P., OpenAI OpCo.,
L.L.C., OpenAI GP, L.L.C., OpenAI,**

Defendants.

Miscellaneous Action No. 1:25-mc-00118

Related to *OpenAI, Inc., Copyright Infringement
Litigation*, Master File No. 1:25-md-3143, SDNY

JOINT STATUS REPORT

Pursuant to the Court’s Order at ECF No. 8, the Parties submit this Joint Status Report to update the Court on the status of their efforts to resolve the pending Motion to Quash (the “Motion”) (ECF No. 1).

Status of document production. Plaintiffs have been producing and will continue to produce documents in connection with this dispute. These future productions will be made on a rolling basis. Defendants are in the process of reviewing the documents produced to date.

Status of the Motion. The Parties continue to believe that the pending Motion can be resolved without further Court intervention, subject to Defendants’ ongoing evaluation of the documents produced by Plaintiffs. The Parties agree that maintaining the current stay of proceedings will facilitate resolution of the Motion and promote judicial efficiency.

Multidistrict litigation transfer and case management. The action in which these subpoenas were issued, *Tremblay, et al. v. OpenAI, Inc., et al.*, Case No. 3:23-03223-AMO (N.D. Cal.), is currently pending in a consolidated multidistrict litigation proceeding in the Southern District of New York. *In re OpenAI, Inc., Copyright Infringement Litig.*, Case No. 1:25-md-03143-SHS-OTW (S.D.N.Y.). On June 20, 2025, the transferee court entered a schedule setting a

substantial document production deadline on September 12, 2025, and the close of fact discovery deadline on February 27, 2026. *Id.* at ECF No. 238.

Proposed next steps. The parties request that this action be related to the pending MDL, Case No. 1:25-md-03143-SHS-OTW (S.D.N.Y.). Alternatively, if the Court declines to relate this action, the Parties propose filing a joint status report on or before August 20, 2025, thirty (30) days from the date of this filing, to inform the Court of the status of the Parties' efforts to reach a resolution.

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